

From: [Jennifer Allim](#)
To: [Carlisle, Marie L.](#)
Cc: [Helen Chaitman](#)
Subject: RE: SERVICE OF COURT DOCUMENTS(S); ADV. PRO. NO. 10-05079
Date: Friday, July 29, 2016 4:18:34 PM
Attachments: [Depositions to be Scheduled \(002\).docx](#)

Hi Marie:

Please see the attached for the proposed dates that I was able to obtain so far. As indicated in the attachment, I am working on coordinating with the remaining clients for whom you have requested dates.

Jennifer Allim
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From: Carlisle, Marie L. [<mailto:mcarlisle@bakerlaw.com>]
Sent: Friday, July 29, 2016 4:08 PM
To: Jennifer Allim <jallim@chaitmanllp.com>
Cc: Helen Chaitman <hchaitman@chaitmanllp.com>; Smith, Rachel M. <rsmith@bakerlaw.com>; Hunt, Dean D. <dhunt@bakerlaw.com>
Subject: RE: SERVICE OF COURT DOCUMENTS(S); ADV. PRO. NO. 10-05079

Jennifer,

As I mentioned the other day, I will be out of the office beginning on Monday, with limited availability after Monday evening. Fact discovery will be closing in the next few weeks in the following adversary proceedings for which I've asked you to supplement discovery and provide deposition dates.

APN 10-04728 DiGiulian	08/11/16
APN 10-04748 Horowitz	08/12/16
APN 10-04541 Kenneth Perlman	08/15/16
APN 10-04768 Placon2	08/15/16

I am relying on your representation below that you are working on obtaining new deposition dates for these and other cases and that you will have them to me by Monday. If we have the new deposition dates by Monday, I can have my office turn around new case management plans next week for approval and filing. If you are unable to get the dates to me by Monday, and can assure me that you will provide new dates by the time I return on August 10th, then we will agree to informally extend fact discovery deadlines in these cases and, upon my return, can assess the status of

discovery and amend case management plans to accommodate your clients' new deposition dates.

Please let me know if you are in agreement with this approach. I am available this afternoon if you would prefer to discuss.

Thanks,

Marie

From: Jennifer Allim [<mailto:jallim@chaitmanllp.com>]
Sent: Thursday, July 28, 2016 5:36 PM
To: Carlisle, Marie L.
Cc: Helen Chaitman
Subject: FW: SERVICE OF COURT DOCUMENTS(S); ADV. PRO. NO. 10-05079

Hi Marie:

Amended responses for Adv. Pro. No. 10-05079, Picard v. Goodman have been submitted.

I am working on obtaining client availability for depositions and should get them to you by Monday, as discussed.

Best,

Jennifer

Jennifer Allim
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From: Sarah Howell
Sent: Thursday, July 28, 2016 6:30 PM
To: dsheehan@bakerlaw.com; ncremona@bakerlaw.com; mcarlisle@bakerlaw.com; dhunt@bakerlaw.com
Cc: Helen Chaitman <hchaitman@chaitmanllp.com>; Jennifer Allim <jallim@chaitmanllp.com>
Subject: SERVICE OF COURT DOCUMENTS(S); ADV. PRO. NO. 10-05079

NAME OF COURT:	U.S. Bankruptcy Court Southern District of New York
CASE NO(S):	10-05079
PLAINTIFF(S)	Irving H. Picard

DEFENDANT(S):	ESTATE OF JAMES M. GOODMAN; and AUDREY GOODMAN, individually, and in her capacity as Personal Representative of the Estate of James M. Goodman
DOCUMENT BEING SERVED:	<ul style="list-style-type: none">- Amended Responses and Objections of Audrey Goodman to Trustee's First Request for Production of Documents;- Amended Responses and Objections of Audrey Goodman to Trustee's First Set of Interrogatories with Verificaiton;- Amended Responses and Objections of Audrey Goodman as Personal Representaitve of the Estate of James M. Goodman to Trustee's First Set of Interrogatories with Verificaiton; and- Amended Responses and Objections of Audrey Goodman as Personal Representaitve of the Estate of James M. Goodman to Trustee's First Request for Produciton of Documents
SENDER'S NAME:	Helen Davis Chaitman, Esq. / Sarah Howell
SENDER'S TELEPHONE NO.:	888-759-1114

Sarah Howell, Paralegal
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ATTACHMENT 1

Depositions to be Scheduled

Notices Sent:

Current Fact Discovery Deadline

APN 10-04768- Picard v. Placon 2

August 15, 2016

Mr. Cohen is available to be deposed during
the second week of October on **10/11 – 10/13**.
He has suggested the use of his conference room
located at **35 Hillside Avenue, Hillside NJ, 07025**.

APN 10-04428- Picard v. Meisels

August 22, 2016

Mr. Meisels is available to be deposed during
the last week in September on **9/27**
in **Short Hills NJ at the Hilton** as previously scheduled.

APN 10-05079- Picard v. James Goodman

August 29, 2016

Mr. Goodman is available to be deposed during
the third week of October on **10/18**
in **New York City at Baker and Hostetler**.

APN 10-04614- Picard v. Whitman

October 15, 2016 (as agreed)

Mr. Whitman is available to be deposed during
the first week in October on **10/4 - 10/6**
in **Jacksonville, Florida**.

We are working on obtaining availability for the following matters

APN 10-04748- Picard v. Mark Horowitz

August 12, 2016

APN 10-04728- Picard v. DiGiulian

August 11, 2016

APN 10-04541- Picard v. Perlman

August 15, 2016

APN 10-04818- Picard v. Harwood

August 18, 2016

APN 10-04914- Picard v. Gordon

August 29, 2016

APN 10-04826- Boyer Palmer

September 1, 2016

APN 10-04644- Russell Dusek

September 6, 2016